UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA DURHAM DIVISION File No. 1:22-CV-478

HAYDEN SCOTT ROSE,	
Plaintiff	JOINT LOCAL RULE 5.5 REPORT
v.	
PRESQUE ISLE VILLAS CONDOMINIUM HOMEOWNERS ASSOCIATION, Inc., PRESQUE ISLE VILLAS CONDOMINIUM HOMEOWNERS ASSOCIATION, Inc., BOARD OF DIRECTORS, COMMUNITY ASSOCIATION MANAGEMENT, Ltd., and BAGWELL HOLT SMITH, P. A.,	
Defendants	

JOINT L.R. 5.5 REPORT FOR THE FILING OF SEALED DOCUMENTS

Conference: The parties have discussed the issues of confidentiality raised in this
case and the potential need for filing documents under seal. That discussion included the nature
of any confidential documents that may be involved in the case, the possibility of using
stipulations to avoid the need to file certain documents, and the possibility of agreed-upon
redactions of immaterial confidential information in filings to avoid the need for filing
documents under seal.
[] Non-Parties: Because a non-party has produced documents pursuant to a
protective order or is otherwise claiming confidentiality over documents filed or expected
to be filed in this case, the conference included
(identify non-party).

[X] <u>Default:</u> The parties certify that few, if any, documents will be filed under seal. The parties agree to use the default procedures of LR 5.4(c). <u>In addition</u>, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality <u>as soon as practicable</u>, but at least two (2) days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

[] Alternative Proposal for Cases with Many Confidential Documents.

In order to address claims of confidentiality and reduce the need to file briefs and exhibits under seal, the parties propose the alternative procedure set out in the attached proposal, either jointly or as competing alternatives, for consideration by the Court.

[] Other relevant information: One Defendant in this case is a law firm. Parties anticipate that some discovery may require sealed documents and/or a protective order due to the nature of the case.

Respectfully Submitted,

By: /s/ M. Shane Perry
M. Shane Perry, Esquire
NC I.D. #35498
Collum & Perry
109 West Statesville Avenue
Mooresville, NC 28115
(704)-663-4187
shane@collumperry.com
Counsel for Plaintiff

By: /s/ Bridget L. Baranyai Bridget L. Baranyai, Esquire NC I.D. #37588 bbaranyai@dmclaw.com Michele F. Eagle, Esquire NC I.D. #33928 meagle@dmclaw.com Dickie, McCamey & Chilcote, P.C. 2101 Rexford Road, Suite 250E Charlotte, NC 28211-3463 (704)-998-5184 Counsel for Defendants Presque Isle Villas Condominium Homeowners Association, Inc., Presque Isle Villas Condominium Homeowners Association, Inc., Board of Directors, and Community Association Management, Ltd.,

By: /s/ Russell M. Racine Russell M. Racine, Esquire NC I.D. #33593 Cranfill Sumner, LLP 2907 Providence Road, #200 Charlotte, NC 28211 (704)-332-8300 rracine@cshlaw.com Counsel for Defendant Bagwell Holt Smith, P.A.